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Consolidated State Application Accountability Workbook

for State Grants under Title IX, Part C, Section 9302 of the Elementary and Secondary Education Act (Public Law 107-110)

REVISED: June 15, 2004



U. S. Department of Education
Office of Elementary and Secondary Education
Washington, D.C. 20202

Instructions for Completing Consolidated State Application Accountability Workbook

By January 31, 2003, States must complete and submit to the Department this Consolidated State Application Accountability Workbook. We understand that some of the critical elements for the key principles may still be under consideration and may not yet be final State policy by the January 31 due date. States that do not have final approval for some of these elements or that have not finalized a decision on these elements by January 31 should, when completing the Workbook, indicate the status of each element which is not yet official State policy and provide the anticipated date by which the proposed policy will become effective. In each of these cases, States must include a timeline of steps to complete to ensure that such elements are in place by May 1, 2003, and implemented during the 2002-2003 school year. By no later than May 1, 2003, States must submit to the Department final information for all sections of the Consolidated State Application Accountability Workbook.

Transmittal Instructions

To expedite the receipt of this Consolidated State Application Accountability Workbook, please send your submission via the Internet as a .doc file, pdf file, rtf or .txt file or provide the URL for the site where your submission is posted on the Internet. Send electronic submissions to conapp@ed.gov.

A State that submits only a paper submission should mail the submission by express courier to:

Celia Sims U.S. Department of Education 400 Maryland Ave., SW Room 3W300 Washington, D.C. 20202-6400 (202) 401-0113

PART I: Summary of Required Elements for State Accountability Systems

Instructions

The following chart is an overview of States' implementation of the critical elements required for approval of their State accountability systems. States must provide detailed implementation information for each of these elements in Part II of this Consolidated State Application Accountability Workbook.

For each of the elements listed in the following chart, States should indicate the current implementation status in their State using the following legend:

- **F:** State has a final policy, approved by all the required entities in the State (e.g., State Board of Education, State Legislature), for implementing this element in its accountability system.
- P: State has a proposed policy for implementing this element in its accountability system, but must still receive approval by required entities in the State (e.g., State Board of Education, State Legislature).
- **W:** State is still working on formulating a policy to implement this element in its accountability system.

Summary of Implementation Status for Required Elements of State Accountability Systems

Pri	inciple '	1: All Schools
F	1.1	Accountability system includes all schools and districts in the state.
F	1.2	Accountability system holds all schools to the same criteria.
F	1.3	Accountability system incorporates the academic achievement standards.
F	1.4	Accountability system provides information in a timely manner.
F	1.5	Accountability system includes report cards.
F	1.6	Accountability system includes rewards and sanctions.
Pr	inciple 2	2: All Students
F	2.1	The accountability system includes all students
F	2.2	The accountability system has a consistent definition of full academic year.
F	2.3	The accountability system properly includes <i>mobile students</i> .
Pri	inciple :	3: Method of AYP Determinations
F	3.1	Accountability system expects all student subgroups, public schools, and LEAs to reach proficiency by 2013-14.
F	3.2	Accountability system has a method for determining whether student subgroups, public schools, and LEAs made adequate yearly progress.
F	3.2a	Accountability system establishes a <i>starting point</i> .
F	3.2b	Accountability system establishes statewide annual measurable objectives.
F	3.2c	Accountability system establishes intermediate goals.
Pr	inciple 4	4: Annual Decisions
F	4.4	
	4.1	The accountability system <i>determines annually the progress</i> of schools and districts.

STATUS Legend:

F – Final state policy
 P – Proposed policy, awaiting State approval
 W – Working to formulate policy

Pr	inciple !	5: Subgroup Accountability
F	5.1	The accountability system includes all the required student subgroups.
F	5.2	The accountability system holds schools and LEAs accountable for the progress of student subgroups.
F	5.3	The accountability system includes students with disabilities.
F	5.4	The accountability system includes limited English proficient students.
F	5.5	The State has determined the minimum number of students sufficient to yield statistically reliable information for each purpose for which disaggregated data are used.
F	5.6	The State has strategies to protect the privacy of individual students in reporting achievement results and in determining whether schools and LEAs are making adequate yearly progress on the basis of disaggregated subgroups.
Pr	inciple (6: Based on Academic Assessments
F	6.1	Accountability system is based primarily on academic assessments.
	inciple 7	7: Additional Indicators
F	7.1	Accountability system includes graduation rate for high schools.
F	7.2	Accountability system includes an additional academic indicator for elementary and middle schools.
F	7.3	Additional indicators are valid and reliable.
Pr	inciple 8	3: Separate Decisions for Reading/Language Arts and Mathematics
F	8.1	Accountability system holds students, schools and districts separately accountable for reading/language arts and mathematics.
Pr	inciple 9	9: System Validity and Reliability
F	9.1	Accountability system produces reliable decisions.
F	9.2	Accountability system produces valid decisions.
F	9.3	State has a plan for addressing changes in assessment and student population.
Pr	inciple '	10: Participation Rate
F	10.1	Accountability system has a means for calculating the <i>rate of participation</i> in the statewide assessment.
F	10.2	Accountability system has a means for applying the 95% assessment criteria to student subgroups and small schools.

STATUS Legend:
F – Final policy
P – Proposed Policy, awaiting State approval
W– Working to formulate policy

PART II: State Response and Activities for Meeting State Accountability System Requirements

Instructions

In Part II of this Workbook, States are to provide detailed information for each of the critical elements required for State accountability systems. States should answer the questions asked about each of the critical elements in the State's accountability system. States that do not have final approval for any of these elements or that have not finalized a decision on these elements by January 31, 2003, should, when completing this section of the Workbook, indicate the status of each element that is not yet official State policy and provide the anticipated date by which the proposed policy will become effective. In each of these cases, States must include a timeline of steps to complete to ensure that such elements are in place by May 1, 2003, and implemented during the 2002-2003 school year. By no later than May 1, 2003, States must submit to the Department final information for all sections of the Consolidated State Application Accountability Workbook.

PRINCIPLE 1. A single statewide Accountability System applied to all public schools and LEAs.

CRITICAL ELEMENT	EXAMPLES FOR MEETING STATUTORY REQUIREMENTS	EXAMPLES OF NOT MEETING REQUIREMENTS
1.1 How does the State Accountability System include every public school and LEA in the State?	Every public school and LEA is required to make adequate yearly progress and is included in the State Accountability System. State has a definition of "public school" and "LEA" for AYP accountability purposes. The State Accountability System produces AYP decisions for all public schools, including public schools with variant grade configurations (e.g., K-12), public schools that serve special populations (e.g., alternative public schools, juvenile institutions, state public schools for the blind) and public charter schools. It also holds accountable public schools with no grades assessed (e.g., K-2).	A public school or LEA is not required to make adequate yearly progress and is not included in the State Accountability System. State policy systematically excludes certain public schools and/or LEAs.

lowa Code subsection 257.2 defines a public school district as " a school corporation organized under chapter 274." lowa Code subsection 279.39 and 281-lowa Administrative Code (IAC) 12.3(9) requires local boards to establish attendance centers (buildings) and grade-level organizations for the buildings under their jurisdiction. In addition, lowa Code subsection 256.7(21)(c) requires school districts, as accredited in lowa, to annually report the progress of student achievement. Therefore, each school district and public school shall be accountable to report progress under AYP. For accountability purposes, a public school that does not house the required grades must back map student results from the school or schools into which its students feed for AYP determination.

Achievement scores for students in any facility or center that is not currently designated as an accredited public school district, but the district provides the educational program for lowa resident students whose total educational program is supported by state school aid formula (lowa Code 257), shall provide the scores for accountability purposes to the public school district/attendance center that was the last recorded residence of the student. These scores must be transmitted to the resident district/attendance center under the following conditions: 1) if a student meets the full academic year requirement, and 2) if the resident district was part of the decision-making team to place the student in another setting for educational purposes. When students do not meet these two conditions, the assessment results for such students will only be included within the state's accountability system. Students in nonpublic schools are not included in the accountability system.

CRITICAL ELEMENT	EXAMPLES FOR MEETING STATUTORY REQUIREMENTS	EXAMPLES OF NOT MEETING REQUIREMENTS
1.2 How are all public schools and LEAs held to the same criteria when making an AYP determination?	All public schools and LEAs are systematically judged on the basis of the same criteria when making an AYP determination. If applicable, the AYP definition is integrated into the State Accountability System.	Some public schools and LEAs are systematically judged on the basis of alternate criteria when making an AYP determination.

In lowa, all public schools and LEAs will be held to the same process and criteria for making adequate yearly progress toward 100% proficiency by the 2013-14 school year. For purposes of AYP accountability, all public schools and LEAs will be judged by performance and improvement on the lowa Tests of Basic Skills (ITBS) and the lowa Tests of Educational Development (ITED). These measures are the common comparable measures across all school districts, thus, ensuring fairness, validity, and reliability when making unbiased, rational, and consistent determinations of the annual progress of LEAs and schools within the state. All schools and districts will be expected to make improvement in student achievement. For the 2002-2003 school year, the AYP formula will apply to all students in grades 4, 8, and 11 in reading and mathematics.

All public school buildings and districts will also be accountable for subgroup performance as required by federal law provided the subgroup meets the minimum size requirement (30) as determined by the state. In the year 2005-06, the AYP definition will include all students and subgroups in grades 3-8 and grade 11 in reading and mathematics.

All public school buildings and districts will make progress towards or maintain (within the bounds of statistical similarity) the state average for other academic indicators. For graduation rate, the State Board of Education has identified a graduation rate of 95% as the end-goal. The current state average is 90%. School districts and schools with graduation rates less than the state average will be expected to increase each year at a minimum (for each group below the state average). The same expectations will be applied to elementary and middle schools for attendance rates. The current state average is 95% attendance rate. School districts and schools with K-8 attendance rates less than the state average will be expected to increase their rates each year at a minimum (for each group below the state average) until they reach the state average. LEAs will be encouraged to exercise their local control flexibility to establish more rigorous goals for these other academic indicators. Group size of an n of 30 will apply to the other academic indicators.

Failure to meet AYP (relative to the state annual goals) by a school or school district for two consecutive years on any of the following indicators will result in a "need of improvement" designation:

- Participation rate in reading assessment and AMO (by Grades 4, 8, 11; by grade span beginning in 2006-2007)
- Participation rate in mathematics assessment and AMO (by Grades 4, 8, 11; by grade span beginning in 2006-2007)
- K-8 attendance rates (by building and district)
- Graduation rate (by building and district). Graduation rate data will be one year in arrears, to allow schools to
 include summer graduates in their total counts. For example, the 2001-2002 graduation rate will be used for
 2002-2003 AYP decisions, and the 2002-2003 graduation rate will be used for 2003-2004 AYP decisions.
- If any school district fails to meet AYP (using annual data *for the AMO*) for two consecutive years in either the "all students" group or one of the subgroups at all the required grade levels (4, 8,and 11) it shall be identified as in need of improvement.

CRITICAL ELEMENT	EXAMPLES FOR MEETING STATUTORY REQUIREMENTS	EXAMPLES OF NOT MEETING REQUIREMENTS
1.3 Does the State have, at a minimum, a definition of basic, proficient and advanced student achievement levels in reading/language arts and mathematics? 1.3 Does the State have, at a minimum, at	State has defined three levels of student achievement: basic, proficient and advanced. Student achievement levels of proficient and advanced determine how well students are mastering the materials in the State's academic content standards; and the basic level of achievement provides complete information about the progress of lower-achieving students toward mastering the proficient and advanced levels.	Standards do not meet the legislated requirements.

STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS

To develop achievement standards, lowa Testing Programs developed an achievement-levels reporting system to assist lowa school districts in meeting Title I reporting requirements. The score report districts receive (Achievement Levels Report) shows the test score scale broken into three main segments called "Low," "Intermediate," and "High." The percent of students in a given grade (e.g., grade 8) who score in each achievement level in a certain subject area (e.g., reading comprehension) is reported. The number of students who score in the Intermediate and High level determines proficiency.

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¹ System of State achievement standards will be reviewed by the Standards and Assessments Peer Review. The Accountability Peer Review will determine that achievement levels are used in determining AYP.

CRITICAL ELEMENT	EXAMPLES FOR MEETING STATUTORY REQUIREMENTS	EXAMPLES OF NOT MEETING REQUIREMENTS
How does the State provide accountability and adequate yearly progress decisions and information in a timely manner?	State provides decisions about adequate yearly progress in time for LEAs to implement the required provisions before the beginning of the next academic year. State allows enough time to notify parents about public school choice or supplemental educational service options, time for parents to make an informed decision, and time to implement public school choice and supplemental educational services.	Timeline does not provide sufficient time for LEAs to fulfill their responsibilities before the beginning of the next academic year.

lowa school districts have been required to submit Annual Progress Reports (APRs) to the DE, their area education agencies (AEAs), and local communities since the year 2000. The APR contains all required achievement data for state and federal reporting. The DE revises APR requirements on an annual basis to comply with any new federal and state legislation. The APR must contain the student achievement results from the past school year for the required academic indicators. Each school district, according to lowa law, is required to report the results of multiple assessments for reading and mathematics. Each local district is also required to demonstrate alignment of assessments to their standards. It is expected that the district's assessment system provides the data information needed for a district to determine needed changes in curriculum and professional development to improve instructional practices. This type of rich and deep assessment system also provides frequent data to teachers and buildings for needed adjustments and modifications to assist in improving student learning. They also provide a basis for districts to anticipate if their students will attain proficiency on the comparable measure across districts, the ITBS and the ITED. The submission deadline for the APR to the state department and local communities has been adjusted from September 15 to August 15. This will ensure that parents are aware of any identified schools in need of improvement as reported in the APR and that parents and communities have the most recent student achievement data before the beginning of the school year.

The DE will assist school districts in identifying schools in need of improvement during each summer before the school year begins. It is anticipated that this identification will be completed by August 1 of each year.

All public districts with schools identified as in need of improvement for two consecutive years are required to offer school choice for their enrolled students during the school year in which they are identified. Identified schools offered public school choice for the 2002-2003 school year.

All public districts with Title I schools identified as in need of improvement for three or more consecutive years are required to offer school choice and supplementary services and take corrective actions, as required by NCLB, during the school year in which they are identified.

CRITICAL ELEMENT	EXAMPLES FOR MEETING STATUTORY REQUIREMENTS	EXAMPLES OF NOT MEETING REQUIREMENTS
1.5 Does the State Accountability System produce an annual State Report Card?	The State Report Card includes all the required data elements as stipulated in No Child Left Behind. The State Report Card is available to the public at the beginning of the academic year. The State Report Card is accessible in languages of major populations in the State, to the extent possible. Assessment results and other academic indicators (including graduation rates) are reported by student subgroups	The State Report Card does not include all the required data elements. The State Report Card is not available to the public.

STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS

In August of each year, the DE will publish and disseminate a state report card that contains all NCLB reporting requirements. This report card will be accessible through the DE's Web site. This report will be in addition to the comprehensive annual state report, *The Annual Condition of Education Report*. This report has been published for 13 years and contains statewide demographic and student achievement data. The state report card is distributed to every LEA, AEA, policymakers, and community leaders and is downloadable from the DE's Web site. A list of current lowa schools in need of improvement is published in the 2002 state report card. Graduation rates for gender and race/ethnicity were also reported for the state in 2002. All federal reporting requirements, to the extent possible until the state student record system is operational, will be included in the August state report card.

CRITICAL ELEMENT	EXAMPLES FOR MEETING STATUTORY REQUIREMENTS	EXAMPLES OF NOT MEETING REQUIREMENTS
How does the State Accountability System include rewards and sanctions for public schools and LEAs? ²	State uses one or more types of rewards and sanctions, where the criteria are: • Set by the State; • Based on adequate yearly progress decisions; and, • Applied uniformly across public schools and LEAs.	State does not implement rewards or sanctions for public schools and LEAs based on adequate yearly progress.

Currently, the state collects information on the academic progress of all schools and districts that house the required grades for testing by lowa law and in compliance with the '94 ESEA. In the past, only Title I schools have been identified as schools in need of improvement if the school failed to make AYP in reading and/or mathematics. Identified schools implement local action plans for improvement and receive technical assistance in the areas of reading and mathematics to successfully implement those plans. All school districts have been required by Iowa Code 256.7 and 281-IAC 12.8(4) to establish annual student achievement improvement goals. If the goals are not met for two consecutive years, a school district is required to file a corrective action plan with the DE and inform the community. Continued failure to meet the goals can result in a district self-study in consultation with the DE, revised school improvement plans, site visits by the DE, and institution of a Phase II accreditation visit by the DE which can result in sanctions up to and including the loss of accreditation. 281-IAC 8(4)

For the school year beginning 2003-2004, all public school buildings and districts will be identified if the required growth established by AYP is not met for two consecutive years and the corrective actions and sanctions required by federal code will be implemented in Title I buildings.

The lowa State Board of Education will annually recognize school districts and schools that have significantly reduced achievement gaps in reading and mathematics for the required subgroups.

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² The state must provide rewards and sanctions for all public schools and LEAs for making adequate yearly progress, except that the State is not required to hold schools and LEAs not receiving Title I funds to the requirements of section 1116 of NCLB [§200.12(b)(40)].

PRINCIPLE 2. All students are included in the State Accountability System.

CRITICAL ELEMENT	EXAMPLES FOR MEETING STATUTORY REQUIREMENTS	EXAMPLES OF NOT MEETING REQUIREMENTS
2.1 How does the State Accountability System include all students in the State?	All students in the State are included in the State Accountability System. The definitions of "public school" and "LEA" account for all students enrolled in the public school district, regardless of program or type of public school.	Public school students exist in the State for whom the State Accountability System makes no provision.

STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS

All students enrolled in public schools will be included in the calculation of AYP at the school, district, and state level. All public school students in the state are currently required by 281-IAC 12.8 (1)(f) to be assessed in reading and mathematics at least once a year. By lowa policy, 281-IAC 41.3(2) the state holds each district responsible for either providing or making provisions for appropriate special education and related services to meet the requirement of state and federal statutes and rules. Iowa policy requires the attending district to report progress to the resident district. For accountability purposes, the assessment results will be included within the resident district's accountability system under the following conditions: 1) if a student meets the full academic year requirement; and 2) if the resident district was part of the decision-making team to place the student in another setting for educational purposes. When students do not meet these two conditions, the assessment results for such students will only be included within the state's accountability system.

It is anticipated that by 2004-2005, the DE will electronically collect an individual student data record from each school district. This system will enable districts and the state to provide accountability information in the aggregate and by subgroup, where appropriate. A student level management information system appears to be the most efficient manner to collect the necessary accountability information. Such a system will improve the accuracy and timeliness of data.

CRITICAL ELEMENT	EXAMPLES FOR MEETING STATUTORY REQUIREMENTS	EXAMPLES OF NOT MEETING REQUIREMENTS
2.2 How does the State define "full academic year" for identifying students in AYP decisions?	The State has a definition of "full academic year" for determining which students are to be included in decisions about AYP. The definition of full academic year is consistent and applied statewide.	LEAs have varying definitions of "full academic year." The State's definition excludes students who must transfer from one district to another as they advance to the next grade. The definition of full academic year is not applied consistently.

STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS

The electronic record system described in the previous section will also enable districts and the state to determine students who have been enrolled for a full academic year. Until such a system is fully implemented, each school and district will code on the test form each student's status regarding full academic year.

For accountability purposes, a full academic year will be determined for each individual student who was enrolled on the first day of the testing period for ITBS and ITED in the previous school year and enrolled through the academic year to the first day of the testing period for ITBS and ITED for the current school year. For the school years 2002-2003 and 2003-2004, all students tested will be included in the state level proficiency percentages. Full academic year will be included when a student management system is operational at the state level.

For those students using the portfolio process to demonstrate achievement through the alternate assessment, March 31 will be the "official" due date for the alternate assessment (i.e., due date for completion of portfolios and date for full academic year determinations). If a student is enrolled, even if not for a full academic year, teachers are to collect evidence for a portfolio and submit it for scoring (this way, the student will count in the participation rate). If a student moves during the year, the portfolio must follow the student to the new district. Those who were continuously enrolled from the prior March 31 will be counted as having been enrolled for a Full Academic Year, and those results will be included with the AMO determinations.

CRITICAL ELEMENT	EXAMPLES FOR MEETING STATUTORY REQUIREMENTS	EXAMPLES OF NOT MEETING REQUIREMENTS
2.3 How does the State Accountability System determine which students have attended the same public school and/or LEA for a full academic year?	State holds public schools accountable for students who were enrolled at the same public school for a full academic year. State holds LEAs accountable for students who transfer during the full academic year from one public school within the district to another public school within the district.	State definition requires students to attend the same public school for more than a full academic year to be included in public school accountability. State definition requires students to attend school in the same district for more than a full academic year to be included in district accountability. State holds public schools accountable for students who have not attended the same public school for a full academic year.

STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS

Since 1999, all students in a school are to be tested if enrolled on the testing date. School districts have been required to report to the DE on an annual basis the number of students enrolled on the date of testing and the number who participated in the test. Beginning in 2003-2004, all students' status for enrollment will be coded on the test forms for ITBS and ITED. This will provide each school district and the state with the scores for students who have been in attendance for a full academic year at the district and state level. Thus, each student score will be calculated into the proficiency levels for the school, district, and state level to determine AYP. Each public school building and each public school district will be held accountable for those students who have been enrolled for a full academic year.

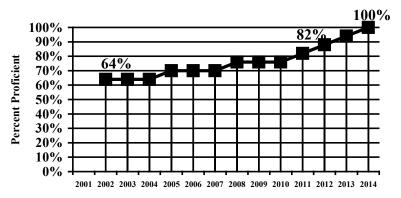
PRINCIPLE 3. State definition of AYP is based on expectations for growth in student achievement that is continuous and substantial, such that all students are proficient in reading/language arts and mathematics no later than 2013-2014.

CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF NOT MEETING REQUIREMENTS
How does the State's definition of adequate yearly progress require all students to be proficient in reading/language arts and mathematics by the 2013-2014 academic year?	The State has a timeline for ensuring that all students will meet or exceed the State's proficient level of academic achievement in reading/language arts ³ and mathematics, not later than 2013-2014.	State definition does not require all students to achieve proficiency by 2013-2014. State extends the timeline past the 2013-2014 academic year.

The state has defined AYP to require all students to be proficient in both reading and mathematics by the end of the 2013-2014 academic year. Proficiency for reading and mathematics will be determined separately for each content area and grade span (3-5, 6-9, and 10-12), and will be operationally defined as those students who achieve the 41st percentile (national student norms) or higher on the ITBS or the ITED. Iowa will be using the norms finalized in the year 2000. This cut point was determined through consultation with the USDE as part of the standards, assessment, and accountability requirements of ESEA '94, and agreed to by the DE.

The same mathematical formula will be used to determine the extent to which all LEAs, buildings within an LEA, and subgroups within buildings and LEAs have met AYP. Pursuant to 34CFR 200.17(a) and (b), the state's trajectory will consist of six equal, incremental increases for student proficiency levels. (Also see Appendix A: The Iowa Model)

Intermediate Goal Trajectory



For AYP determination, all public schools and districts will be included in the state's accountability system. Any section 1116 consequences for schools failing to meet AYP will be limited to those schools receiving federal Title I funds.

If an assessment that is included in the state's determination of AYP is taken more than once by a student, the results of the initial administration of that test will be the result that will be included in the AYP determination.

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³ If the state has separate assessments to cover its language arts standards (e.g., reading and writing), the State must create a method to include scores from all the relevant assessments.

CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF NOT MEETING REQUIREMENTS
3.1 How does the State Accountability System determine whether each student subgroup, public scho and LEA makes AYP?	For a public school and LEA to make adequate yearly progress, each student subgroup must meet or exceed the State annual measurable objectives, each student subgroup must have at least a 95% participation rate in the statewide assessments, and the school must meet the State's requirement for other academic indicators. However, if in any particular year the student subgroup does not meet those annual measurable objectives, the public school or LEA may be considered to have made AYP, if the percentage of students in that group who did not meet or exceed the proficient level of academic achievement on the State assessments for that year decreased by 10% of that percentage from the preceding public school year; that group made progress on one or more of the State's academic indicators; and that group had at least 95% participation rate on the statewide assessment.	State uses different method for calculating how public schools and LEAs make AYP.

CRITICAL ELEMENT

EXAMPLES FOR
MEETING REQUIREMENTS

EXAMPLES OF
NOT MEETING
REQUIREMENTS

AYP for student subgroups will be determined at the school level by content area and grade.

AYP at the district level will be determined by content area and when all required grade levels (4, 8, and 11) have either the "all students" group or one of the subgroups that do not meet AYP state targets.

Schools and districts will be held to the following requirements:

- A minimum of 95% of all students and each subgroup included in the assessment program,
- Meet or exceed the annual measurable objectives and intermediate goals, or be within the confidence interval for statistical significance, or meet the safe harbor requirement, and
- Meet or exceed the state's requirement for other academic indicators. For graduation rate, the State Board of Education has identified a graduation rate of 95% as the end-goal. The current state average is 90%. School districts and schools with graduation rates less than the state average will be expected to increase their rates (for each group below the state average) until they reach the state average. The same expectations will be applied to elementary and middle schools for Average Daily Attendance. School districts and schools with K-8 attendance rates less than the state average will be expected to increase their rates (for each group below the state average) until they reach the state average. LEAs will be encouraged to exercise their local control flexibility to establish more rigorous goals for these other academic indicators.

Pursuant to current federal guidance, the state will utilize a uniform (unweighted) averaging procedure of up to three years of data (current year and two years in arrears) to evaluate the extent to which a school or district has met the 95% participation rate guidelines for each content area, grade level, and subgroup for a school or district. Additionally, the state will utilize a weighted averaging procedure of up to three years of data (current year and two years in arrears) to evaluate the extent to which a school or district has met the AMO or IG, within the confidence interval.

	CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF NOT MEETING REQUIREMENTS
3.2a	What is the State's starting point for calculating Adequate Yearly Progress?	Using data from the 2001-2002 school year, the State established separate starting points in reading/language arts and mathematics for measuring the percentage of students meeting or exceeding the State's proficient level of academic achievement. Each starting point is based, at a minimum, on the higher of the following percentages of students at the proficient level: (1) the percentage in the State of proficient students in the lowest-achieving student subgroup; or, (2) the percentage of proficient students in a public school at the 20 th percentile of the State's total enrollment among all schools ranked by the percentage of students at the proficient level. A State may use these procedures to establish separate starting points by grade span; however, the starting point must be the same for all like schools (e.g., one same starting point for all elementary schools, one same starting point for all elementary schools, one same starting point for all middle schools).	The State Accountability System uses a different method for calculating the starting point (or baseline data).

CRITICAL ELEMENT

EXAMPLES FOR MEETING REQUIREMENTS

EXAMPLES OF NOT MEETING REQUIREMENTS

The state's initial starting points, for each content area and level, determined independently, were identified by the percent of students proficient at the 20th percentile in enrollment with schools ranked from high to low by percent proficient. Using the 2000-2001 and 2001-2002 biennium data, these were:

Grade Level	Reading	Mathematics
(3-5)	65	64
(6-9)	61	63
(10-12)	69	69

To increase the reliability of the results, the state, LEAs, and schools will use two-year rolling averages. The current starting points were calculated using Grade 4, Grade 8, and Grade 11 results, (these are the only grades currently required by Iowa Administrative Code). Local education agencies will be required to administer tests in the additional grades (3, 5, 6, and 7), during 2005-2006, and these additional grades will be included in the AYP determination during 2006-2007, when the state will have biennium data for these additional grades. Results across the required grades within a building will be collapsed to create a single target for reading and mathematics at each school building.

The state education agency (SEA) will be using 10 as the threshold for reporting to the public (as per lowa Administrative Code), 40 as the threshold for participation rates in the district-wide assessment system for AYP, and 30 as the threshold for establishing baselines for the reportable groups for AYP. Only the scores for those students who have been enrolled for at least one full academic year (enrolled at the beginning of the testing period during the previous school year) will be included in the AYP calculations, at the building, LEA, or state levels.

The state will transition to using annual data for AYP decisions beginning with the 2004-05 school year. For the 2004-05 AYP decisions, the state will revert to the original starting points, state trajectories, annual measurable objectives, and intermediate goals (based on annual data) established for the January 31, 2003 workbook submission.

CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF NOT MEETING REQUIREMENTS
3.2b What are the State's annual measurable objectives for determining adequate yearly progress?	State has annual measurable objectives that are consistent with a state's intermediate goals and that identify for each year a minimum percentage of students who must meet or exceed the proficient level of academic achievement on the State's academic assessments. The State's annual measurable objectives ensure that all students meet or exceed the State's proficient level of academic achievement within the timeline. The State's annual measurable objectives are the same throughout the State for each public school, each LEA, and each subgroup of students.	The State Accountability System uses another method for calculating annual measurable objectives. The State Accountability System does not include annual measurable objectives.

CRITICAL ELEMENT

EXAMPLES FOR MEETING REQUIREMENTS

EXAMPLES OF NOT MEETING REQUIREMENTS

STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS

lowa's current accountability system requires all LEAs to annually demonstrate improvement toward their long-range goals in reading and mathematics. In the model described in section 3.1, the annual measurable objective is to accelerate, or, at a minimum, maintain the trajectory established by the mathematical formula. Because of the use of unified accountability trajectories by the state, all LEAs, grades within LEAs, subgroups within LEAs, all buildings will be expected to attain the state's trajectory. During years 3, 6, 9, 10, 11, and 12 of the plan, the intermediate goals are also the annual measurable objectives. During the other years (1, 2, 4, 5, 7, and 8), the annual measurable objective is not met if the state's trajectory is not met, confidence interval determination and safe harbor notwithstanding.

In order to reduce sampling error, data will be averaged across a two-year (biennium) period, and will be collapsed at each level. For example, in an elementary school with a traditional grade configuration (K-5), the scores for students in years 2005-2006 and 2006-2007 will be combined, and scores for students in Grades 3, 4, and 5 will be combined. Therefore, the scores for these six groups of students will be evaluated for proficiency rates as a single group for each content area. In this example, these data will be used to make AYP decisions for the 2006-2007 school year. This process will also increase the number of students, narrow the width of the confidence band, and reduce the number of subgroups that are excluded from AYP determinations.

The state will transition to using annual data for AYP decisions beginning with the 2004-05 school year. The state will continue to use the trajectories, annual measurable objectives, and intermediate goals that were determined using biennium data. This will be done for the following reasons:

- Schools that reorganize would be able to be included in the accountability system immediately, instead of
 having to wait for two years of data to examine AYP. This would also enable a smoother transition from
 testing in Grades 4 and 8 to testing in Grades 3 through 8.
- Change in the percent of proficient students would be based on data from adjacent years, instead of comparing results over a three-year period. The technical issues surrounding "annualizing" results could be avoided, in favor of examining actual change from one year to the next.
- The confidence interval currently in place serves as a mechanism to account for sampling error, and is the preferred method over biennium averaging.

Full academic year will be defined as the time from the first day of a testing window in the previous school year to the first day of the testing window in the current school year. For example, if a student was enrolled on the first day of the testing window during the previous year (whether or not that student took the test), he/she will be counted as having been enrolled for a full academic year. The only way a student could be excluded from the test is if that student had a medical excuse. Pursuant to recent federal guidance, in the event that a student is unable to participate in the assessment due to a significant medical emergency, that student may be able to be excluded from the participation and proficiency rates. This will be handled on a case-by-case basis through the AYP appeal process.

CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF NOT MEETING REQUIREMENTS
3.2c What are the State's intermediate goals for determining adequate yearly progress?	State has established intermediate goals that increase in equal increments over the period covered by the State timeline.	The State uses another method for calculating intermediate goals. The State does not include

CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF NOT MEETING REQUIREMENTS
	The first incremental increase takes effect not later than the 2004-2005 academic year.	intermediate goals in its definition of adequate yearly progress.
	Each following incremental increase occurs within three years.	

STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS

The state has established six intermediate goals of equal increments. To make AYP, LEAs, schools, and subgroups must demonstrate at a minimum, a rate of change determined by the same mathematical formula that will keep those entities "on target" so that all students are proficient by 2013-2014.

Using six equal increments, for example, using 64% proficiency as a 2000-2001 baseline, for 36% points improvement in non-linear fashion:

First goal: 2004-2005: 6% points more of the total number of students proficient Second goal: 2007-2008: 6% points more of the total number of students proficient 2010-2011: 6% points more of the total number of students proficient 2011-2012: 6% points more of the total number of students proficient 2012-2013: 6% points more of the total number of students proficient 2012-2013: 6% points more of the total number of students proficient 2013-2014: 6% points more of the total number of students proficient 36% points improvement. 100% proficient

To make AYP, LEAs, schools, and subgroups must demonstrate student proficiency at the state's target for that time period, fall within the confidence band for the number of students tested and the target proficiency level, or meet safe harbor requirements as specified by regulation. For example, by referring back to the chart for item 3.1, the 2000-2001 starting point of 64% proficient will remain the same for three years, until 2004-2005, the time at which the intermediate goal of 70% proficient must be reached. This will remain the same for the next three years, until 2008, when the intermediate goal of 76% proficient will be achieved. This will remain the same for the next three years until 2011, when the intermediate goal of 82% proficient will be achieved. The annual measurable objectives and the intermediate goals for 2012, 2013, and 2014 are the same, i.e., 88% proficient, 94% proficient, and 100% proficient.

respectively. (See Appendix B for specific AMO for reading and mathematics.)

PRINCIPLE 4. State makes annual decisions about the achievement of all public schools and LEAs.

CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF NOT MEETING REQUIREMENTS
4.1 How does the State Accountability System make an annual determination of whether each public school and LEA in the State made AYP?	AYP decisions for each public school and LEA are made annually. ⁴	AYP decisions for public schools and LEAs are not made annually.
STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS		

⁴ Decisions may be based upon several years of data and data may be averaged across grades within a public school [§1111(b)(2)(J)].

CRITICAL ELEMENT

EXAMPLES FOR MEETING REQUIREMENTS

EXAMPLES OF NOT MEETING REQUIREMENTS

Based on the concept of continuous improvement for all schools, the proposed model integrates AYP into the state's current accountability system. Iowa's current accountability system requires that every LEA must establish annual improvement goals in reading, mathematics, and science. Also, current identification procedures stipulate that if a school achieves below the state target for two consecutive years, they are identified as in need of improvement.

Two criteria to meet were that the model must not let any entity (school, district, state) escape responsibility for improvement as per state expectations, and ensure 100% proficiency by 2014, as per federal expectations. The proposed model fulfills both of these criteria.

In the proposed model:

- If a school is achieving at or above the state's trajectory, and their rate of change is on track for 100% in 2014, they meet AYP for that year.
- If a school is achieving at or above the state's trajectory, and their rate of change is not on track for 100% in 2014, they meet AYP for that year but they will need to file a corrective action plan with the lowa Department of Education
- If a school is not achieving at the state's trajectory, but their proportion of proficient students falls within the confidence interval, or if they meet the safe harbor requirements as specified in regulations, they meet AYP for that year.
- If a school is not achieving at the state's trajectory, their proportion of proficient students falls outside of the confidence interval, and they fail to meet safe harbor requirements as specified in regulations, they do not meet AYP for that school year. If they do not meet AYP for two consecutive years within the same content area and grade span the school will be identified as a school in need of improvement.
- If a school does not achieve attendance rate or graduation rate indicators as established by the state, they will not meet AYP for that school year. If they do not meet AYP for two consecutive years the school will be identified as a school in need of improvement.
- If a school does not test 95% of all students in the aggregate and by required subgroups they will not meet AYP for that school year. If they do not meet AYP for two consecutive years the school will be identified as a school in need of improvement.

If an entity does not achieve an annual measurable objective or an intermediate goal, the SEA will implement a method to consider student-sampling error to investigate the extent to which the students tested are similar or dissimilar (in percent proficiency). This will be accomplished through a binomial test of proportions. This method is more easily implemented than recalculating proficiency levels based on the standard error of measurement of a test. A lookup table can be constructed for the target percentages that contains the various combinations of the number of students tested and the percentages of students that are proficient. From the lookup table, one will be able to determine if the percent of proficient students is significantly different from the target percent. This calculation will utilize a 98% (one-tailed) confidence band for the significance test.

If an entity whose proportion of proficient students is statistically significantly different from (below) the state's trajectory target, the SEA will determine if the entity qualifies for safe harbor. The entity will need to have reduced the percent of non-proficient students by 10% or more, need to have met the target for the other academic indicator (for the disaggregated group), and have tested not less than 95% of the students enrolled in each group.

PRINCIPLE 5. All public schools and LEAs are held accountable for the achievement of individual subgroups.

	CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF NOT MEETING REQUIREMENTS
5.1	How does the definition of adequate yearly progress include all the required student subgroups?	Identifies subgroups for defining adequate yearly progress: economically disadvantaged, major racial and ethnic groups, students with disabilities, and students with limited English proficiency. Provides definition and data source of subgroups for adequate yearly progress.	State does not disaggregate data by each required student subgroup.

The subgroup reporting requirements, by state law, currently in force are more rigorous than the federal reporting requirements, and align with ESEA '94. As such, all LEAs have implemented systems that enable them to monitor the progress of each subgroup of students.

Regarding participation rates, Iowa Administrative Code currently requires all students to be accounted for under each LEAs district-wide assessment plan. Most are in the general academic assessment, while others participate in an alternate assessment.

The data for each group of students meeting the minimum-n of requirements and full academic year will be included in the AYP determinations.

To enable subgroup reporting at the state level, the DE will electronically collect and maintain a database of individual student records. Each record will contain the appropriate demographic information to enable subgroup aggregation for accountability measures. The DE has already undertaken the implementation of a state level student database for reporting and anticipates a statewide system by 2004-2005. This will serve as the infrastructure to append additional data elements/fields, which then would facilitate the establishment of a student-unit database for state level reporting. Additional information is currently collected from LEAs via a web-based data entry and verification system.

C	CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF NOT MEETING REQUIREMENTS
LE pr su de	low are public schools and EAs held accountable for the rogress of student ubgroups in the etermination of adequate early progress?	Public schools and LEAs are held accountable for student subgroup achievement: economically disadvantaged, major ethnic and racial groups, students with disabilities, and limited English proficient students.	State does not include student subgroups in its State Accountability System.

The subgroup accountability requirements will be those required by NCLB. As such, all LEAs have implemented systems that enable them to report the progress of each subgroup of students for both reporting and accountability purposes. Minimum-n for reporting results to the community is ten. Participation rates, as well as additional information, are required to be included in each LEA's annual progress report. Collapsing across grades within levels and across two years will increase the number of subgroups that are included in AYP analyses at the school and district level.

The other academic indicators will be:

- Graduation rate (high school graduation with a regular diploma in the standard number of years)
- Average daily attendance (elementary and middle school).

If any public school fails to meet AYP (using biennium data for the AMO (reverting to annual data beginning 2004-05) for two consecutive years in the same content area and grade level, it shall be identified as in need of improvement. Full academic year and minimum-n of 30 applies. Confidence interval for statistical significance and safe harbor provisions apply as appropriate.

Additionally, if any school district fails to meet AYP (using biennium data *for the AMO*, reverting to annual data beginning 2004-05) for two consecutive years in either the "all students" group or one of the subgroups at all the required grade levels (4, 8, and 11) it shall be identified as in need of improvement. Full academic year does not apply: minimum-n of 30 applies.

If a public school fails to meet the 95% participation rate (using annual participation rate data) for its building-wide or district-wide assessment program (by content area and grade level), it fails to meet AYP. Full academic year does not apply; minimum-n of 40 applies.

If a school district fails to meet the 95% participation rate (using annual participation rate data) for its district-wide assessment program (by content area and in the all students group or one of the subgroups at each of the required grade levels (4, 8,and 11), it fails to meet AYP. Full academic year does not apply; minimum-n of 40 applies.

	CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF NOT MEETING REQUIREMENTS
5.3	How are students with disabilities included in the State's definition of adequate yearly progress?	All students with disabilities participate in statewide assessments: general assessments with or without accommodations or an alternate assessment based on grade level standards for the grade in which students are enrolled. State demonstrates that students with disabilities are fully included in the State Accountability System.	The State Accountability System or State policy excludes students with disabilities from participating in the statewide assessments. State cannot demonstrate that alternate assessments measure grade-level standards for the grade in which students are enrolled.

Local education agencies are responsible for the inclusion of all students in their district-wide assessment programs. Local education agencies are expected to test every student. This could be done in the general assessment, the general assessment with accommodations, or an alternate assessment. Any students taking out-of-level below their grade level peers will be counted as participating, but not as proficient.

Students tested in the general assessment with or without accommodations are included in the AYP determination. Students with significant disabilities who participate in the alternate assessment will be counted in the participation rate calculation. Proficiency scores of students participating in any alternate assessment that compares student performance with alternate achievement standards will be included as part of the 1% cap on proficiency at the district and state levels, as per regulations. Alternate assessment proficient scores for students, not to exceed 1% of the student enrollment in the tested grades, will be aggregated with the general education assessment for AMO determinations.

The revised regulation (34 CFR, Part 200, Federal Register, Tuesday, December 9, 2003) specifies an allowance of being able to combine the proficient scores from the alternate assessment for students with significant disabilities of up to 1% of all students in the grades assessed, with the proficiency scores of students in the general education assessment, for purposes of determining AYP. Iowa utilizes this provision in the calculation of proficiency rates for the AMOs and Intermediate Goals (IG).

We would encourage the USDE to reconsider the position on out-of-level tests. Testing students out-of-level either at levels below or above grade level peers is appropriate when standards are articulated across levels and vertical linkages of scale scores can allow a raw score to be translated so that it is comparable with grade level peers.

Pursuant to Secretary Spellings' new flexibility for students with disabilities, lowa will utilize the "Option 1" flexibility for schools that are identified for not making AYP solely on the basis of the SWD subgroup. Iowa will utilize a 16% proxy, calculated in accordance with USED guidelines, and will apply the proxy to such schools to determine if the additional AYP by proxy applies, without the use of a confidence interval.

CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF NOT MEETING REQUIREMENTS
5.4 How are students with limited English proficiency included in the State's definition of adequate yearly progress?	All LEP student participate in statewide assessments: general assessments with or without accommodations or a native language version of the general assessment based on grade level standards.	LEP students are not fully included in the State Accountability System.
	State demonstrates that LEP students are fully included in the State Accountability System.	

Local education agencies are responsible for the inclusion of all students in their district-wide assessment programs. Local education agencies are expected to test every student. This could be done in the general assessment, the general assessment with accommodations, or an alternate assessment. Students tested in the general assessment with or without accommodations are included in the AYP determination.

Currently, an English language learners (ELL) assessment committee comprised of SEA, AEA, and LEA staff are participating in the development of an English language proficiency test, and an alternate assessment process for reading and mathematics. For English language proficiency, the committee is scheduled to participate in the LEP-SCASS pilot, and is also investigating the work of states who have developed their own English language assessments. For alternate assessment in reading and mathematics, the committee is investigating the implementation of a process that is similar to the alternate assessment for students with severe disabilities.

Development of an alternate assessment for ELL is in the beginning stages. Until this assessment is implemented, LEAs will have all ELL students attempt to take the ITBS/ITED with or without accommodations and thus they will be counted as participating. It is anticipated this assessment will be implemented in 2004-2005. English language learners who participate in the alternate assessment will be counted in the participation rate and AMO calculations. After implementation of the alternate assessment, students for whom other documentation is provided (and who did not participate in the alternate assessment) will continue to be counted as a part of the exclusion rate.

Based on current federal guidance,

- All ELL will participate in an English language proficiency assessment annually, as per Title III guidelines.
- For ELL in their first year of enrollment in US schools (defined as up to 180 school days of enrollment):
 - The English language proficiency assessment will constitute their participation in reading for AYP purposes retroactive for 2003-04 school year (participation rate calculation).
 - Students will participate in the state's accountability assessment in mathematics, which will constitute their participation in mathematics for AYP purposes (participation rate calculation).
 - These students will not be included in AMO calculations for reading or mathematics in any appropriate membership subgroups (as per US ED guidance) retroactive for 2003-04 school year.
- All ELL will be monitored within the ELL category for AYP purposes for two years after exiting the ELL program.

CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF NOT MEETING REQUIREMENTS
5.5 What is the State's definition of the minimum number of students in a subgroup required for reporting purposes? For accountability purposes?	State defines the number of students required in a subgroup for reporting and accountability purposes, and applies this definition consistently across the State. ⁵ Definition of subgroup will result in data that are statistically reliable.	State does not define the required number of students in a subgroup for reporting and accountability purposes. Definition is not applied consistently across the State. Definition does not result in data that are statistically reliable.

Related to items 3.2a and 5.2, the SEA will be using 10 as the threshold for reporting to the public (as per 281-IAC 12 .8(3)(b)(1)), 40 as the threshold for participation rates in the district-wide assessment system, and 30 as the threshold for the AMO/IG for the reportable groups. Only the scores for those students who have been enrolled for at least one full academic year will be included in the AMO/IG calculations, at the building, LEA, or state levels.

If a subgroup is below the minimum-n for the AMO part of AYP (30), that subgroup will be excluded from the AYP determination (because minimum-n for participation rate (40) for that group is also not met). However, the data from that subgroup will be aggregated at (rolled-up to) the next higher level for participation rate, AMO, and AYP purposes.

If the "all students" group is still less than the minimum-n, SEA will use a binomial test of proportions to determine AYP. A lookup table will be constructed for the target percentages that contains the various combinations of the number of students tested and the percentages of students that are proficient. This calculation will be done for schools/groups of any size. From the lookup table, one will be able to determine if the percent of proficient students is significantly different from the target percent. This calculation will utilize a 98% (one-tailed) confidence band for the significance test. For schools falling outside of the confidence band, the SEA will determine if safe harbor provisions, as specified in regulation, will enable such schools to meet AYP.

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⁵ The minimum number is not required to be the same for reporting and accountability.

CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF NOT MEETING REQUIREMENTS
5.6 How does the State Accountability System protect the privacy of students when reporting results and when determining AYP?	Definition does not reveal personally identifiable information. ⁶	Definition reveals personally identifiable information.

STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS

Currently, when LEAs create their APRs for their communities, they suppress any results that are based on fewer than ten students. The DE will not release any results that identify an individual student. State and local reports will be in compliance with the provisions of FERPA. The SEA will continue to use an n-size of ten for reporting unless it violates confidentiality. Results will also be masked if all students, in the aggregate or within a subgroup, scores fall within one performance level.

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⁶ The Family Education Rights and Privacy Act (FERPA) prohibits an LEA that receives Federal funds from releasing, without the prior written consent of a student's parents, any personally identifiable information contained in a student's education record.

PRINCIPLE 6. State definition of AYP is based primarily on the State's academic assessments.

CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF NOT MEETING REQUIREMENTS
6.1 How is the State's definition of adequate yearly progress based primarily on academic assessments?	Formula for AYP shows that decisions are based primarily on assessments. ⁷ Plan clearly identifies which assessments are included in accountability.	Formula for AYP shows that decisions are based primarily on non-academic indicators or indicators other than the State assessments.

Student proficiency in reading and mathematics are the primary method to determine progress for AYP. Iowa has determined that proficiency for students in reading and mathematics is defined by the achievement level descriptors contained in the ITBS and the ITED. These levels will be used to determine AYP determinations for reading and mathematics. These tests are academic assessments that are valid and reliable. Iowa will also determine the objectives for the additional indicators required by NCLB Section 1111 (b)(2)(C)(vi) as part of the annual AYP identification for schools/districts in need of improvement. These additional indicators are graduation and attendance rate.

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⁷ State Assessment System will be reviewed by the Standards and Assessments Peer Review Team.

PRINCIPLE 7. State definition of AYP includes graduation rates for public High schools and an additional indicator selected by the State for public Middle and public Elementary schools (such as attendance rates).

	EXAMPLES FOR	EXAMPLES OF
CRITICAL ELEMENT	MEETING REQUIREMENTS	<i>NOT</i> MEETING REQUIREMENTS
7.1 What is the State definition for the public high school graduation rate?	State definition of graduation rate: Calculates the percentage of students, measured from the beginning of the school year, who graduate from public high school with a regular diploma (not including a GED or any other diploma not fully aligned with the state's academic standards) in the standard number of years; or, Uses another more accurate definition that has been approved by the Secretary; and Must avoid counting a dropout as a transfer. Graduation rate is included (in the aggregate) for AYP, and disaggregated (as necessary) for use when applying the exception clause to make AYP.	State definition of public high school graduation rate does not meet these criteria.

Graduation rates for schools and school districts in Iowa will be based upon data submitted by each district in the annual Basic Educational Data Survey (BEDS) to the DE.

The number of high school graduates collected through the BEDS is defined as the sum of the following:

- Students receiving regular diplomas. Regular diplomas are given to students for completing all unmodified district graduation requirements in the standard number of 4 years.
- Students receiving regular diplomas from an alternative placement within the district, or who have had the **requirements** modified in accordance with a disability and make take longer than the standard four years to graduate.

The high school graduation rate is calculated by dividing the number of high school graduates in a given year by the estimated number of 9th grade students (the denominator for calculating the graduation rate) is sum of the number of high school graduates in a year and dropouts over the four-year period. The number of graduates is defined as the sum of students receiving a diploma, defined above, plus the number of students defined as "other completers." Other completers are students who have finished the high school program but did not earn a diploma. More specifically, the total dropouts are defined as the number of dropouts in grade 9 in year 1, the number of dropouts in grade 10 in year 2, the number of dropouts in grade 11 in year 3, and the number of dropouts in grade 12 in year 4. The high school graduates in year 4 divided by the number of high school graduates in year 4 plus the sum of dropouts in grades 9 through 12 from years 1 through 4, respectively. GED recipients must have dropped out of school prior to entering a GED program and thus are already included in the dropout numbers.

The state of lowa **annually** computes the graduation rate for districts and the state **each** school year. This rate is reported by the state in *The Annual Condition of Education Report* issued **annually** in November. Each school district also reports their graduation rate in the APR to their community **annually** by August 15. Until the Student Management System is operational for the state, projected to be **2006-2007**, the state is unable to compute a graduation rate by school building and subgroups. It is expected that this capability will be in operation for the **2006-2007** school year. Until that time the lowa Department of Education will work with the eight school districts that have more than one high school to compute graduation rate by building according to the formula established by the state.

⁸ See USC 6311(b)(2)(I)(i), and 34 C.F.R. 200.20(b)

CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF NOT MEETING REQUIREMENTS
7.2 What is the State's addition academic indicator for pub elementary schools for the definition of AYP? For pub middle schools for the definition of AYP?	ic indicators, e.g., additional State or locally administered assessments not	State has not defined an additional academic indicator for elementary and middle schools.

The lowa State Board of Education approved an additional indicator for elementary and middle schools on January 16, 2003. This indicator is the average daily attendance rate for elementary and middle school students and also reported by gender, race/ethnicity, socioeconomic status, students with disabilities, and other subgroups as required by state or federal law.

Average daily attendance is defined as the aggregate days of student attendance in a school or school district divided by the aggregate days of enrollment. For 2002-2003 and 2003-2004 any LEA whose K-8 attendance rate is less than the state average and has not made progress toward achieving the state average, will work with the Iowa Department of Education to examine school level 4th and 8th grade group and subgroup attendance rates to see if safe harbor applies for AYP determination. Each school and district will be required to report the data on an annual basis and is responsible for making progress toward the state target. If progress is not evident the state will identify the district as not making AYP and a district will be required to identify a school as not making AYP. If they do not meet AYP for two consecutive years they will be identified as in need of improvement. Attendance information by subgroup will not be available until the student record system is operational in the state, projected at 2005-2006.

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⁹ NCLB only lists these indicators as examples.

CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF NOT MEETING REQUIREMENTS
7.3 Are the State's academic indicators valid and reliable?	State has defined academic indicators that are valid and reliable. State has defined academic indicators that are consistent with nationally recognized standards, if any.	State has an academic indicator that is not valid and reliable. State has an academic indicator that is not consistent with nationally recognized standards. State has an academic indicator that is not consistent within grade levels.

STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS

It is anticipated that the state will have a student records system in operation by 2004-2005. The DE will review the data submitted by school districts relative to the graduation rate and attendance rates. Iowa Department of Education personnel on an annual basis will audit this evidence.

The graduation rate calculation is consistent with the methodology recommended by the National Center for Education Statistics.

PRINCIPLE 8. AYP is based on reading/language arts and mathematics achievement objectives.

CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF NOT MEETING REQUIREMENTS
8.1 Does the state measure achievement in reading/language arts and mathematics separately for determining AYP?	State AYP determination for student subgroups, public schools and LEAs separately measures reading/language arts and mathematics. AYP is a separate calculation for reading/language arts and mathematics for each group, public school, and LEA.	State AYP determination for student subgroups, public schools and LEAs averages or combines achievement across reading/language arts and mathematics.

lowa has consistently identified schools for AYP by determining the progress of students separately in reading and mathematics. Districts have been required to report the percentage of students proficient by the tested grade levels and required subgroups for reading and mathematics. Iowa school districts have consistently, over time, used ITBS/ITED data to report district and school proficiency levels. Iowa Code 256.8 and 281-IAC 12.8(3) require separate reporting. In determining whether or not each subgroup, each building, each school district, and the state meets the annual measurable objectives, the percent of students who achieve proficiency in reading and mathematics will be calculated and reported separately.

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¹⁰ If the state has more than one assessment to cover its language arts standards, the State must create a method for including scores from all the relevant assessments.

PRINCIPLE 9. State Accountability System is statistically valid and reliable.

	CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF NOT MEETING REQUIREMENTS
1	How do AYP determinations meet the State's standard for acceptable reliability?	State has defined a method for determining an acceptable level of reliability (decision consistency) for AYP decisions. State provides evidence that decision consistency is (1) within the range deemed acceptable to the State, and (2) meets professional standards and practice. State publicly reports the estimate of decision consistency, and incorporates it appropriately into accountability decisions. State updates analysis and reporting of decision consistency at appropriate intervals.	State does not have an acceptable method for determining reliability (decision consistency) of accountability decisions, e.g., it reports only reliability coefficients for its assessments. State has parameters for acceptable reliability; however, the actual reliability (decision consistency) falls outside those parameters. State's evidence regarding accountability reliability (decision consistency) is not updated.

As the new accountability system is implemented, the state will evaluate the accuracy of the AYP decisions made within the current context of school improvement, using information from on-site visits, comprehensive school improvement plans, and Annual Progress Reports (APRs) to the community as collateral evidence. This will help determine if, indeed, the schools that need improvement are those being identified. This will help refine the system as appropriate.

- The state will use annual data and will collapse across grades at a site to reduce sampling error.
- The state will establish a minimum-n size of 30 to balance the statistical reliability and increased inclusion of subgroups. The state will establish a minimum-n size of 40 for participation rate. The state will establish a minimum-n size of 10 for reporting.
- The state will use consecutive years of not making AYP in the same content area (reading or mathematics) and grade level for school identification.
- The state will use consecutive years of not making AYP in the same content area (reading or mathematics) and in either "all students" or one of the subgroups at each of the required grade levels (4, 8, and 11) for district identification.
- The state will use a statistical test to determine the extent to which a group of students is similar (or different) from the target group (in terms of proportion of students who are achieving proficiency)
- The state will utilize safe harbor provisions as defined by regulation as appropriate.

	CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF NOT MEETING REQUIREMENTS
9.2	What is the State's process for making valid AYP determinations?	State has established a process for public schools and LEAs to appeal accountability decision.	State does not have a system for handling appeals of accountability decisions.

STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS

The SEA is responsible for identification of LEAs in need of improvement. The LEA is responsible for identification of individual school sites. The ultimate responsibility for the integrity of the data belongs to the LEA and the individual school sites. In order to ensure and maintain a school improvement environment, schools may request a clarification of their identification status at any time. If an LEA desires to appeal an identification, they must be able to provide substantial evidence regarding: 1) extenuating circumstances, 2) dramatic demographic changes, and/or 3) additional evidence regarding student achievement in the content area in question. Appropriate DE staff will review this evidence. A written communication to the LEA superintendent and building principal will provide information regarding status of identification, and further courses of action.

CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF NOT MEETING REQUIREMENTS
9.3 How has the State planned incorporating into its definition of AYP anticipated changes assessments?	on in AYP decisions necessary for	State's transition plan interrupts annual determination of AYP. State does not have a plan for handling changes: e.g., to its assessment system, or the addition of new public schools.

Currently, the lowa test data are limited to Grades 4, 8, and 11. Upon implementation of 3-8 testing in 2005-2006 (and for the biennium, 2006-2007), lowa will begin collapsing across grades at each site. Until then, lowa will utilize biennium data for Grades 4, 8, and 11.

Because LEAs have different grade configurations, the configuration of the LEA sites will determine the manner in which AYP will be determined for a specific site or for the LEA as a whole. For example, if an LEA merged its 3rd and 4th grade students into one site, 5th and 6th grade students into another site, and 7th and 8th grade students into yet another site, AYP would be determined for each site using the results for the two tested grades at each site, and with two years of (biennium) data. As such, then any identification would not only be at the building level, but also at the district level. State level reporting, however, will be in the traditional grade spans (3-5, 6-9, and 10-12).

¹¹ Several events may occur which necessitate such a plan. For example, (1) the State may need to include additional assessments in grades 3-8 by 2005-2006; (2) the State may revise content and/or academic achievement standards; (3) the State may need to recalculate the starting point with the addition of new assessments; or (4) the State may need to incorporate the graduation rate or other indicators into its State Accountability System. These events may require new calculations of validity and reliability.

PRINCIPLE 10. In order for a public school or LEA to make AYP, the State ensures that it assessed at least 95% of the students enrolled in each subgroup.

CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF NOT MEETING REQUIREMENTS
10.1 What is the State's methor calculating participation in the State assessments use in AYP determination	the number of absent or untested students (by subgroup and	The state does not have a procedure for determining the rate of students participating in statewide assessments. Public schools and LEAs are not held accountable for testing at least 95% of their students.

For the school year of 2001-2002, the state required all school districts to use the following steps to compute participation:

- 1. Report the total number of all students at grade level enrolled on the date of the general ITBS/ITED assessment.
- Report the total number of all students at grade level administered the general ITBS/ITED assessment with or without accommodations.
- 3. Report the total number of all students at grade level administered the alternate assessment.
- 4. Report the percentage of all students enrolled who participated in and are represented in the data for the ITBS/ITED assessment. (Divide #2 by #1.)
- 5. Report the total percentage of students enrolled who participated in either the ITBS/ITED of the alternate assessment. (Add #2 and #3 and divide by #1.)

For the school year of 2002-2003, the state will require all school districts/schools to use the following steps to compute the participation rate:

- Report the total number of all students and subgroups at grade level enrolled on the date of the general ITBS/ITED assessment.
- Report the total number of all students and subgroups at grade level administered the ITBS/ITED assessment with or without accommodations.
- Report the total number of all students and subgroups who participated in an alternate assessment.
- 4. Report the total percentage of students and subgroups enrolled who participated in either the ITBS/ITED or the alternate assessment. (Add #2 and #3 and divide by #1)
- 5. Report the number of students who were not tested, disaggregated by group and subgroup.

The state will collect participation rates at the building level as well as district level. Determining participation rate as part of AYP, lowa will use a minimum size of 40 for all groups and subgroups at a school or district level. A school or district that reports fewer than 95% and has a subgroup of less than 40 will not be considered as failing to meet AYP on the basis of participation rate. The state will require school districts to report participation rates that include students whose scores are returning to the resident district (as described in section 1.1).

CRITICAL ELEMENT	EXAMPLES FOR MEETING REQUIREMENTS	EXAMPLES OF NOT MEETING REQUIREMENTS
10.2 What is the State's policy for determining when the 95% assessed requirement should be applied?	State has a policy that implements the regulation regarding the use of 95% allowance when the group is statistically significant according to State rules.	State does not have a procedure for making this determination.

STATE RESPONSE AND STATE ACTIVITIES FOR MEETING REQUIREMENTS

School buildings and districts will be required to report participation rates for students included in the ITBS, the ITED, and alternate assessments for students with disabilities. School buildings and districts that meet the 95% participation rate will meet that AYP requirement. If a school or district meets the minimum n of 40 and does not meet 95% participation rate for two consecutive years they will be identified as a school or district in need of improvement. If a subgroup is less than 40 and there is a participation rate of less than 95%, then the AYP decision based on participation rate will not apply to that school or district.

APPENDICES

Appendix A: The Iowa Model

Appendix B: Annual Measurable Objectives

Appendix A

The Iowa Model

Neither the "Catch up" model nor the "Equal contribution" model fulfills the purposes of holding all schools accountable for improvement, considering equity in the application of adequate yearly progress, and ensuring 100% proficiency by 2013-2014. Therefore, Iowa is proposing a model that the state believes fulfills the intent of NCLB, while integrating the provisions of NCLB into the state's current accountability system.

lowa calls this model a "Relative contribution" model. It is characterized by identifying each LEA whose percent proficient for the "all students" group is above the state's trajectory, establishing a trajectory that will ensure achieving 100% proficiency by 2013-2014, and comparing the change in percent of proficient to the state's trajectory and to their own trajectory. For any subgroup whose proficiency percentage falls below the state's trajectory, the NCLB AYP decision process will take precedence. In this way, an LEA must first meet the state's trajectory for NCLB for all subgroups, then meet their own trajectory for lowa regulations.

Because NCLB stipulates a status model, the change in status for lowa is a function of how many *more* students (percent) need to achieve proficiency than achieved proficiency the previous year. To stipulate the "same" number is to apply formulas that are fundamentally inequitable. Iowa has chosen to achieve "sameness" for LEAs achieving above the state's trajectory by applying the same formula to each such LEA. Local education agencies then may, for schools that are above the state's trajectory, apply the LEA's trajectory to all schools within the LEA, or calculate the "relative contribution" of each school building toward the LEA's trajectory. As such, uniform application of the trajectory formula will continue to expect lower performing schools to "make up" more ground (in order to reach the state's trajectory) than higher achieving schools.

To illustrate this model, consider the following: If the state's goal is 5% a year for the 12-year period (40% proficient), a school that has 24% nonproficient students (76% proficient) would need to move 2% to the proficient level (or one student if the percentage yielded a fraction of a student) each year for 12 years. Any school with less than 40% proficiency (for any subgroup) would be expected to reach the state's trajectory (NCLB precedence). Each LEA's and building's trajectory goals could be set in the same way. While the percentage of change expected is not the same for each district, the formula is applied in the same way for all schools and districts. It is more equitable, such that those with the greatest number of proficient students are also expected to make a difference for their students who aren't proficient. It also ensures 100% proficiency within the timeline. This model reflects the intent of NCLB when the other two models do not, and in fact, is more rigorous for all schools, specifically for the high performing schools that are already achieving above the state's trajectory.

Appendix B

STATE PERFORMANCE TARGETS (ANNUAL MEASURABLE OBJECTIVES) (ANNUAL DATA)

GRADES:	4	•

Math	Percent of Students at Proficient or Advanced
2002-2003 Target	62.0
2003-2004 Target	62.0
2004-2005 Target	68.3
2005-2006 Target	68.3
2006-2007 Target	68.3
2007-2008 Target	74.7
2008-2009 Target	74.7
2009-2010 Target	74.7
2010-2011 Target	81.0
2011-2012 Target	87.3
2012-2013 Target	93.7
2013-2014 Target	100.0

Reading/Language Arts	Percent of Students at Proficient or Advanced
2002-2003 Target	64.0
2003-2004 Target	64.0
2004-2005 Target	70.0
2005-2006 Target	70.0
2006-2007 Target	70.0
2007-2008 Target	76.0
2008-2009 Target	76.0
2009-2010 Target	76.0
2010-2011 Target	82.0
2011-2012 Target	88.0
2012-2013 Target	94.0
2013-2014 Target	100.0

STATE PERFORMANCE TARGETS (ANNUAL MEASURABLE OBJECTIVES) (ANNUAL DATA)

GRADES: _____8____

Math	Percent of Students at Proficient or Advanced
2002-2003 Target	58.0
2003-2004 Target	58.0
2004-2005 Target	65.0
2005-2006 Target	65.0
2006-2007 Target	65.0
2007-2008 Target	72.0
2008-2009 Target	72.0
2009-2010 Target	72.0
2010-2011 Target	79.0
2011-2012 Target	86.0
2012-2013 Target	93.0
2013-2014 Target	100.0

Reading/Language Arts	Percent of Students at Proficient or Advanced
2002-2003 Target	60.0
2003-2004 Target	60.0
2004-2005 Target	66.7
2005-2006 Target	66.7
2006-2007 Target	66.7
2007-2008 Target	73.3
2008-2009 Target	73.3
2009-2010 Target	73.3
2010-2011 Target	80.0
2011-2012 Target	86.7
2012-2013 Target	93.3
2013-2014 Target	100.0

STATE PERFORMANCE TARGETS (ANNUAL MEASURABLE OBJECTIVES) (ANNUAL DATA)

GRADES:	11	
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Math	Percent of Students at Proficient or Advanced
2002-2003 Target	69.0
2003-2004 Target	69.0
2004-2005 Target	74.2
2005-2006 Target	74.2
2006-2007 Target	74.2
2007-2008 Target	79.3
2008-2009 Target	79.3
2009-2010 Target	79.3
2010-2011 Target	84.5
2011-2012 Target	89.7
2012-2013 Target	94.8
2013-2014 Target	100.0

Reading/Language Arts	Percent of Students at Proficient or Advanced
2002-2003 Target	69.0
2003-2004 Target	69.0
2004-2005 Target	74.2
2005-2006 Target	74.2
2006-2007 Target	74.2
2007-2008 Target	79.3
2008-2009 Target	79.3
2009-2010 Target	79.3
2010-2011 Target	84.5
2011-2012 Target	89.7
2012-2013 Target	94.8
2013-2014 Target	100.0